

UNITED STATES DISTRICT COURT  
FOR THE  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

Case No. 1:20-cr-00623-JSR-1

V

WILLIE DENNIS

**MOTION TO ALLOW DEFENDANT'S  
SUPERVISED PROBATION  
PORTION OF SENTENCE  
TO BE SERVED IN THE  
MIDDLE DISTRICT OF  
FLORIDA**

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COMES NOW the undersigned, on behalf of the Defendant in this cause, and files this Motion To Allow Defendant To Serve The Probation Portion Of His Sentence In The Middle District Of Florida, and would state the following:

1. The undersigned is an active member of the Florida Bar, Florida Bar # 192303, and is an active member of the bar of the United States District Court, Northern District Of Florida.

2. The undersigned has appeared on behalf of the Defendant in this matter *pro bono*, with regards to legally assisting the Defendant in presenting to this Court the Defendant's *pro se* Motion For Sentence Reduction Under 18 U.S.C. Section 3582 ( c )(1)(A) (Compassionate Release), which this Court has denied because it lacked jurisdiction

3.. All of the representations made to the Court heretofore in that motion and the Exhibits attached thereto are realleged as if fully set forth herein, to include but are not limited to the facts that the Defendant has limited physical abilities, serious unresolved medical conditions, uncertain cognitive capacity, and an emotional state of mind that precludes him from presenting this instant matter to the Court objectively.

4. In further support of this motion the Defendant states that the recommendation by the US Marshal's Service that the supervised probation beginning on or before June 25, 2024, being prepared by the US Marshal's Service be served at a homeless shelter in the State Of New York, is not in the best interest of the State, the victims, the Defendant, nor the Defendant's family.

5. Additionally, the pre-trial custody of the Defendant at that time was conducted under the jurisdiction of the Middle District of Florida Marshal Service, where the Defendant was residing with his parents in their home and where he would continue to reside upon the completion of the incarceration portion of his sentence.

6. Attorney Rick Stone, a member of the New York state bar, has agreed to deliver the Defendant from the NY Southern District jurisdiction to the Florida Middle District jurisdiction in a timely manner consistent with appropriate instructions from the US Marshal's Service

WHEREFORE the undersigned requests that this Motion be granted by this Court and that the US Marshal's Service be directed to act accordingly, and represent to this Court its compliance when preparing their post-incarceration recommendations.

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished by e-mail to Attorney David Cohen, at [david@cfblaw.com](mailto:david@cfblaw.com), and to AUSA Sarah L. Kushner, The Southern District of New York, U.S. Attorney Office, 1 St. Andrews Plaza, New York, NY 10007, at [sarah.cushner@usdoj.gov](mailto:sarah.cushner@usdoj.gov), Attorney Richard Paul Stone, Esquire, at [rps@stonecounsel.com](mailto:rps@stonecounsel.com), and NY Southern District Marshal's Service by USPS at 500 Pearl Street, Suite 400, New York, New York 10007-0316, this 7<sup>th</sup> day of June, 2024.

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